

EXHIBIT A

AFFIDAVIT OF ROBERT CARR

I, Robert Carr, first being sworn under oath, depose and say:

1. I am over the age of 18 and am a resident of the state of Arizona. I have personal knowledge of the facts set forth in this Affidavit.

2. Since 2002, I have been employed at Bard Peripheral Vascular, Inc. I am presently the Senior Director of Research and Development. During my time at Bard Peripheral Vascular, I had responsibility for research and development of inferior vena cava filters, as well as several other devices.

3. Bard Peripheral Vascular, Inc., is headquartered in Tempe, Arizona, and is a subsidiary of C. R. Bard, Inc., which is headquartered in Murray Hill, New Jersey.

4. For the Recovery line of inferior vena cava filters (i.e., the Recovery Filter, G2 Filter, G2X Filter, G2 Express Filter, Eclipse Filter, Meridian Filter, and Denali Filter), Bard Peripheral Vascular is the company that was and is principally responsible for all activities related to the filters.

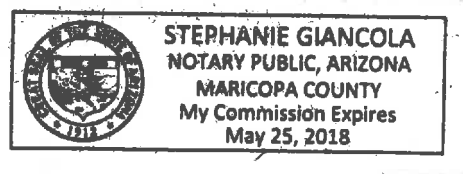
5. From its headquarters in Tempe, Arizona, Bard Peripheral Vascular had and continues to have principal responsibility in designing the filters, testing the filters, directing the manufacturing of the filters, developing contents of the instructions for use that accompanies the filters, communicating with the FDA regarding the filters, developing marketing material for the filters, training the sales force regarding interacting with physicians about filters, developing written communications to physicians related to the filters, developing and maintaining a quality and post-market surveillance system regarding the filters, and deciding when each new generation of filter is first marketed and the previous generation filter stops being marketed.

FURTHER AFFIANT SAYETH NOT.


Robert Carr

Sworn to and subscribed before me
on this 18 day of March, 2015


NOTARY PUBLIC



My Commission Expires: May 25, 2018